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UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

IN RE: . Case No. 22-20823-GLT
. .
. .
U LOCK INC, . 5414 U.S. Steel Tower
. 600 Grant Street
. Pittsburgh, PA 15219
Debtor. .
. June 5, 2023
. 12:02 p.m.

TRANSCRIPT OF #398 EMERGENCY MOTION TO STAY SUBPOENA HEARING OR
REQUEST FOR EXPEDITED HEARING FILED BY USAAG SYSTEMS CO.

BEFORE HONORABLE GREGORY L. TADDONIO
UNITED STATES BANKRUPTCY COURT JUDGE

APPEARANCES:

For the Debtor: Law Office of J. Allen Roth
By: J. ALLEN ROTH, ESQ.
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For Christine Biros: Bernstein-Burkley, P.C.
By: STUART C. GAUL, JR., ESQ.
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TELEPHONIC APPEARANCES:

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For Shanni Snyder: The Lynch Law Group LLC
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1 ECRO: Court may now come to order. The Honorable
2 Gregory L. Taddonio presiding.

3 THE COURT: All right. Good afternoon, everyone.
4 This is the United States Bankruptcy Court for the Western
5 District of Pennsylvania and this is the time set for a hearing
6 on Case Number 22-20823, U LOCK INCORPORATED.

7 I'll begin by taking appearances. I'll start first
8 with the moving party, USAAG Systems Company.

9 MR. SANTICOLA: Your Honor, Michael Santicola on
10 behalf of USAAG.

11 THE COURT: All right. Mr. Santicola, if you can
12 just speak up because you're coming across rather faintly. I
13 don't know if you've got anything obstructing your microphone,
14 or at least move closer to your microphone when you are
15 addressing the Court. That would be appreciated.

16 MR. SANTICOLA: I will do that, Your Honor.

17 THE COURT: Thank you. All right. I will take
18 appearances for the responding parties. First, Christine
19 Biros.

20 MR. GAUL: Your Honor, Stuart Gaul of
21 Bernstein-Burkley on behalf of Ms. Biros.

22 THE COURT: All right. Good morning -- or good
23 afternoon.

24 MR. GAUL: Good afternoon.

25 THE COURT: All right. And then I'll take a

1 appearance for responding party Shanni Snyder.

2 MR. LACHER: Good morning, Your Honor. John Lacher
3 on behalf of Shanni Snyder.

4 THE COURT: All right. And I'll take additional
5 appearances, although there's no other parties that filed
6 responsive documents, but I'll start here in the courtroom.

7 MR. ROTH: Allen Roth on behalf of U LOCK.

8 THE COURT: All right. Good afternoon.

9 MR. SNYDER: George Snyder.

10 THE COURT: All right. Good afternoon.

11 And is there anyone else on the Zoom call who wishes
12 to enter an appearance?

13 (No audible response)

14 THE COURT: All right.

15 This is a Hearing on a Request to Stay a Subpoena or
16 Request a Protective Order with respect to a Subpoena that was
17 issued to Citizens Bank requesting account information for a
18 bank account held by USAAG, a non-party to this Bankruptcy
19 action.

20 I've got responses in opposition by USAAG, and a
21 joinder from Shanni Snyder.

22 I've had an opportunity to review the papers, and I
23 have made some initial impressions on this and, quite frankly,
24 I need some clarification or explaining from Ms. Biros' side on
25 this because I can tell you, I'm not really seeing the

1 relevance of this.

2 This seems like a significant overreach, and based on
3 what I understand this Subpoena to be related to, which is the
4 Evidentiary Hearing that I have scheduled on Shanni Snyder's
5 Claim and the Objection to that Claim, I have no clue or
6 concept of how this remotely relates to that.

7 So, I'm inclined right now to grant the Motion and
8 issue a Protective Order, and tell me why I am wrong in
9 reaching that conclusion.

10 MR. GAUL: Your Honor, the issue before you at that
11 Hearing is going to be whether Ms. Snyder's Claim is fraudulent
12 or is false. Whether her Claim that she worked the hours, the
13 60 hours a week, seven days a week for five years that she
14 claims to have worked is actually true.

15 We, of course, maintain that she did not do that
16 work. As Your Honor is aware, we have in the past pointed to
17 documents that Ms. Snyder herself has filed under penalty of
18 perjury with this Court.

19 But we've also contended for months that one of the
20 motivations for Ms. Snyder to make these claims is that there
21 is a larger agreement going on among Ms. Snyder, her brothers
22 who are the managers of U LOCK, and potentially other persons,
23 with regard to the purpose for this. And that the real purpose
24 of Ms. Snyder's Claim --

25 THE COURT: Okay. So, that's all related to your

1 RICO Claim that's pending.

2 MR. GAUL: That is related to a RICO Claim, Your
3 Honor, but it's also related --

4 THE COURT: And you're counsel to the RICO Claim,
5 right?

6 MR. GAUL: That's correct, Your Honor. But it is
7 also related here.

8 THE COURT: Okay. So, should I draw any significance
9 to the fact that you are here arguing this Motion and not the
10 Bankruptcy counsel that's been here on prior instances?

11 MR. GAUL: I don't think you should, Your Honor. I
12 think in some respects I'm here because I was the last person
13 stuck in the office on the Friday before Memorial Day.

14 THE COURT: Okay.

15 MR. GAUL: But there is no question that some of the
16 information that would come up here would also be relevant to
17 the RICO proceeding. There is no question about that.

18 THE COURT: All right. Well let me start with this.
19 Whatever I've been saying on this is germane to this
20 Bankruptcy. I'm not making any determination as to whether
21 it's relevant in the RICO action. It may very well be relevant
22 in the RICO action. But I'm questioning how it was issued in
23 this case and has any bearing to this case whatsoever. Because
24 if you were operating under the guise of credibility, well that
25 seems to open up Pandora's Box and you could ask for whatever

1 you want.

2 MR. GAUL: Right. But in this situation, Your Honor,
3 we're dealing with a case in which USAAG has actually in this
4 case offered money both to U LOCK and to Ms. Snyder, which
5 raises a logical inference that if there is some sort of
6 conspiracy, which we think would make it less likely that Ms.
7 Snyder actually performed the work she claims, if there is a
8 conspiracy then somehow there must be some connection between U
9 LOCK offering money to both the Debtor and the person with the
10 Claim against the Estate who purchased the assets of the
11 Estate.

12 Under this situation we did take a measured approach
13 to see what was going on. We issued, as Your Honor is aware,
14 the first Subpoena just to find out a little bit more
15 information, if we could, about one of the U LOCK accounts.

16 THE COURT: All right. Let me stop you there.
17 "Measured approach" was your words. And I'm aware that there
18 has now been a new Motion to Quash a Subpoena and seek a
19 Protective Order with respect to a Subpoena that your office
20 issued to the Catholic School System for records involving Ms.
21 Snyder's son.

22 MR. GAUL: All we're looking for in that, Your Honor,
23 is whether, in fact --

24 THE COURT: Well, let's start with that.

25 MR. GAUL: Sure.

1 THE COURT: How is that measured?

2 MR. GAUL: Well, first of all, let me back up because
3 the specifics of the Subpoena are that we asked for information
4 that she filed -- we asked for information with regard to any
5 financial aid applications that she filed. And our concern
6 with that is that what we wanted to see --

7 THE COURT: You're looking for information about
8 where he lives?

9 MR. GAUL: I'm sorry?

10 THE COURT: You're looking for information on where
11 he lives?

12 MR. GAUL: I think we're looking for information, we
13 may have been looking for information on her addresses. I
14 don't recall that we were looking for information on his.

15 THE COURT: Documents sufficient to show the
16 residence of any of the minor children at any time during the
17 requested period.

18 MR. GAUL: Your Honor, we're also in that course of
19 that looking for information about financial aid applications
20 because those are going to show whether she claimed that she
21 was working during that period. And I understand Your Honor's
22 concerns about overbreadth on that Subpoena.

23 THE COURT: Oh, I think we're way beyond overbreadth
24 now. I think the wheels have completely fallen off on this. I
25 mean, going after the minor child of a party in this litigation

1 || is beyond the pale.

2 MR. GAUL: But, again, Your Honor, we're not -- and I
3 understand that, but we still think that the financial aide
4 information on that Motion is particularly relevant.

5 THE COURT: How is that relevant to whether or not
6 she has an allowed Claim?

7 MR. GAUL: Because her allowed Claim is based on her
8 having a job and performing a job during that period.

9 THE COURT: Okay.

10 MR. GAUL: If she asserted --

11 THE COURT: But her allegation is, she wasn't paid
12 for that job. So, it actually would seem to be consistent.

13 MR. GAUL: But the question is, is there --

14 THE COURT: Now, you've quoted that I've --

15 MR. GAUL: I'm sorry.

16 THE COURT: -- I've found Ms. Snyder's Claims and
17 allegations to be quite dubious. And I have said that, and I'm
18 interested in seeing the proof in support of this Claim.

19 But I've got to tell you, I mean, you're not doing
20 yourself any favors with this stuff. This is ridiculous. And
21 again you know if you find information -- let's just go down,
22 and again, this is a Motion that is not even heard in front of
23 me today, but I just --

24 MR. GAUL: Sure.

25 THE COURT: I can't get my head around it because

1 it's informative as to there is no limitation on what's being
2 sought at this point in this litigation. And we've lost all
3 concept of reality of what we're going to try in July. And I'm
4 starting to think I'm going to have to put some pretty tight
5 guide rails on the parties, or else this hearing is going to
6 get completely out of hand.

7 But you know let's assume for sake of argument you
8 get -- I mean, I'm assuming you must think for some reason that
9 she got some sort of financial assistance through the school
10 system?

11 MR. GAUL: We think that. Yeah, we are concerned
12 about that.

13 THE COURT: Okay. So, if she did, it seems to be
14 that might be consistent with her allegation that she had a job
15 and wasn't paid for four years.

16 MR. GAUL: It is, but --

17 THE COURT: So, I don't know how that helps support
18 your Claim but -- or your defense here. But, again, I just --
19 I come back to, this is really personal, and beyond what would
20 seem to be any semblance of relevance as to whether or not she
21 worked for U LOCK, whether she actually incurred the hours that
22 she did, and whether she is entitled to the wages that she's
23 asserted. I just don't see how this moves at all forward in
24 any way. But, again, that's that Motion.

25 Let's turn back to this Motion. If there is a

1 conspiracy, you know, again, assuming the facts that you've
2 alleged in the District Court Complaint are true, I still don't
3 know how that has any bearing on whether or not Shanni Snyder
4 has an allowed Claim in this Estate.

5 MR. GAUL: The question at that point, Your Honor, is
6 who is involved in the conspiracy? Is there any connection
7 between USAAG on the one hand and Ms. Snyder -- and the
8 property that Ms. Snyder owns in North Huntingdon.

9 THE COURT: Okay. But, again, these are all --

10 MR. GAUL: I'm sorry. That Ms. Biros owns in North
11 Huntingdon.

12 THE COURT: Well, these are all RICO issues. These
13 have nothing to do with the Claim allowance. You know, I
14 agree, if there is a conspiracy there and these parties are
15 working in concert with each other to cause the involuntary and
16 shift money around and do all these things, that may be
17 perfectly fine in a RICO action, but it doesn't relate to this.

18 MR. GAUL: But it makes it less likely that she
19 actually did the work that she claims to have done here. And
20 that's the work that gives rise to both her Claim in this case
21 and her Judgment in the Bankruptcy which she has used in this
22 action, as well.

23 THE COURT: How many Subpoenas did you issue?

24 MR. GAUL: I believe two to Citizens Bank and one to
25 the Diocese.

1 THE COURT: That's it?

2 MR. GAUL: That is it, that I remember, and when I
3 get back I will check and promptly inform the Court if there
4 are any more.

5 THE COURT: All right. Anything further you want to
6 say at this point?

7 MR. GAUL: Nothing, Your Honor. Thank you.

8 THE COURT: Thank you. Mr. Santicola, anything you
9 wish to raise at this point?

10 MR. SANTICOLA: Your Honor, I think that the Court
11 understands our position. And I can, you know, for sake of
12 time just rely on what we've put into our Motion. You know to
13 me, I'm not sure how you would prove a conspiracy from 2016 to
14 2021 with records from '22 and '23. I mean, this Motion asks
15 for -- I mean, they want USA -- or my client's confidential
16 commercial information, every financial transaction, every
17 transferee, officer's identification, and signature cards. I
18 mean, none of that is relevant.

19 So, I think the Court understands our position. I
20 don't need to talk just for the sake of hearing my voice. So,
21 you know, we believe the Subpoena should be quashed.

22 THE COURT: All right. Thank you. Mr. Lacher,
23 anything further from you?

24 MR. LACHER: Yes, Your Honor. Thank you.

25 I certainly agree with everything Mr. Santicola just

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1 set forth.
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2 I have some additional matters to bring to the
3 attention of the Court which touch on what we're dealing with
4 here today.

5 Your Honor issued an Order regarding the Evidentiary
6 Hearing on Biros' Objection to Ms. Snyder's Claim. In that
7 Order you specifically wrote, "Matters to be addressed are
8 limited to the merits of Claim Number 1 filed by Shanni
9 Snyder." You also put that Order that, "Prior to the
10 Evidentiary Hearing the parties shall meet and confer to
11 discuss a resolution of the case."

12 I would suggest, Your Honor, I don't believe the
13 Biros side is adhering to that Order, and I think the Court
14 should know what's going on out here. And to do that I'd just
15 like to set forth a couple of time lines for you, and I think
16 this will be instructive.

17 As far as the Subpoena time lines, on April 21st I
18 received a copy of something called a Notice of Subpoena.
19 There was no Subpoena attached to it, no reference to USAAG.

20 So, on April 24th I called Attorney Lindsay at the
21 Bernstein Law Office and asked for a copy of the Subpoena
22 itself.

23 On April 26th I sent a follow-up email to Attorney
24 Lindsay regarding my request for the copy of the Subpoena.

25 On May 2nd Attorney Lindsay sent me a Subpoena

1 exhibit, still not the Subpoena itself. The exhibit makes no
2 mention of USAAG. It just lists Citizens Bank and account
3 numbers. So, there's no way for me to tell who the accounts
4 are.

5 I will tell the Court the truth. I assumed they were
6 somehow U LOCK accounts, and they were trying to track money in
7 and out of U LOCK, but I didn't know.

8 On May 12th we received discovery requests to Shanni
9 Snyder. In those discovery requests, you know in the beginning
10 we give parties instructions and deadlines, they put in there
11 that we had 14 days to respond to the discovery requests. I
12 think that's contrary to the Rules. Of course the Court can
13 order a shorter time or the parties can stipulate to a shorter
14 time, but to unilaterally give a 14-day response period is
15 improper.

16 On May 24th I received a second set of discovery
17 responses to Ms. Snyder and again it provided a 14-day
18 discovery period.

19 On May 26th Mr. Fuchs sent a letter to the Bernstein
20 Office -- Mr. Fuchs being my co-counsel -- objecting to the
21 14-day response time and asking for all Subpoenas to be -- that
22 had been issued, copies of the full Subpoenas.

23 On May 26 copies of Subpoenas were provided, and then
24 that was the first time we saw that they had contacted the
25 Greensburg Catholic School System to get information on Ms.

1 Snyder's minor children.

2 So, I would argue that the discovery that they have
3 set forth in the Subpoenas and, and we'll get to that later in
4 the case, but the requests from Ms. Snyder herself are beyond
5 the scope of discovery, in violation of the Rules, they're
6 late, they're incomplete, and they're improper.

7 As to the other part of your Order, Your Honor. This
8 is I'll call it the Settlement time line. I won't get into
9 details of the Settlement, but I want you to know what's going
10 on out here.

11 You issued your Order on April 14th. On April 17th I
12 got a call from Trustee Slone asking about my willingness to
13 settle the Claim. I said that I was very much in favor of it
14 because as Mr. Slone explained there was no money in the Estate
15 to pay the Claim anyway.

16 I conveyed to Mr. Slone an offer which Mr. Slone
17 himself, I wish he was on the line, but I've got his consent to
18 say this to the Court, Mr. Slone thought it was a good faith
19 offer and likely to result in a Settlement of the matter under
20 ordinary circumstances.

21 As far as I know, and I don't know, the Bernstein
22 Office never responded to Mr. Slone's reach outs on this
23 Settlement matter.

24 So, after I did a follow-up call to Trustee Slone on
25 April 24th, I called Attorney Lindsay directly and conveyed the

4 By May 12th with me having not received any response,
5 I called Attorney Robert Bernstein directly to inquire
6 regarding the response. I wanted to make sure it was conveyed,
7 the parties were considering it.

13 On May 31st I called Mr. Bernstein back, and I tried
14 to rekindle the resolution. I would call that phone call very
15 promising and productive. We put a lot of details together
16 that might make my Settlement Offer even more attractive.

22 On June 2nd I called Mr. Burkley and left a voicemail
23 message. I have not heard back from him.

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1 mad at me. If Your Honor knew what we were willing to do with
2 regard to this Settlement and you heard that Biros was pushing
3 for this hearing, I think the Court would be angry. And my
4 speculation is that they're keeping this alive simply to do
5 this kind of expansive discovery as Your Honor pointed out to
6 maybe assist in the RICO case or get a head start on it. So, I
7 just wanted the Court to know.

8 I also asked if they would be willing to go to
9 mediation on this matter, which I think would be completely
10 appropriate. They, basically, said well if the Court orders it
11 fine, but we're not consenting to it. So, I tried to get
12 consent to a mediation.

13 Your Honor, this matter should be settled. There is
14 no money in the Estate. We've -- you know this is kind of
15 silly and I'm doing everything I can to bring people to the
16 table, and of course the Court can't make people settle, and
17 neither can I.

18 But I will tell Your Honor we're making good faith
19 proposals and getting stonewalled. So, again, on this matter I
20 agree with USAAG. I think their Motion is well-filed and
21 that's why we've joined them. Thank you, Your Honor.

22 THE COURT: All right. So, it sounds like there have
23 been meet and confer efforts, it just has not yielded any
24 progress though.

25 MR. LACHER: Well, I would agree with Your Honor, but

1 you know, it goes like two weeks without a response, I have to
2 follow-up, I have to do this. I've tried to wrap the Trustee
3 into it. They haven't talked to the Trustee. I just think
4 this is -- I know the Court encourages discussions and
5 Settlements. We're really trying, and I don't believe we're
6 being responded to in total good faith.

7 And again, I have a lot of respect for the Bernstein
8 Firm, Mr. Bernstein. We had wonderful discussions, but I'm
9 getting nowhere fast, and I just don't think they're following
10 the spirit of your Order, Your Honor.

11 THE COURT: Well I don't want to get into Settlement
12 discussions. But what I envision is unique to this is that
13 instead of having a compromise, this goes to an issue of
14 standing that if there is no Claim then there is no standing
15 for the case, and I'm assuming that's why Ms. Biros is taking a
16 tough stand on this, as opposed to being willing to negotiate
17 some sort of resolution or a compromise. But, again, that is
18 what it is.

19 Bottom line is, this case has never made any logical
20 sense in any dimension. The assets have simply not justified
21 the amount of time, expense and lawyering that has gone into
22 this case, and this has been a complete disaster on all
23 accounts.

24 And I had thought that I was pretty clear with the
25 parties on my expectations going forward, that I wasn't going

1 | to put up with any more nonsense. I thought I took some pretty
2 | strong steps, some strong language as to what the Court was not
3 | going to tolerate.

4 And, in fact, I remind everyone I still have two Show
5 Cause Orders that are under advisement that I may have to
6 reevaluate a little bit in light of where we are. But it seems
7 like the parties' actions has not adjusted in any way. We are
8 still proceeding down a path of scorched earth that really has
9 no semblance or rational relation to what the issues are that
10 the Court needs to decide. And you know if my prior warnings
11 weren't strong enough, then perhaps I need to go even further.

12 All right. Anything else from the parties at this
13 point?

14 MR. LACHER: No, Your Honor.

15 MR. GAUL: Nothing, Your Honor.

16 THE COURT: All right. Well, here's where I am. I
17 think this Subpoena, the one that's in front of me today as to
18 the Citizens Bank and the USAAG account, it's RICO discovery
19 disguised as discovery in this Bankruptcy proceeding. It has
20 no relevance that I can see to the Claim Objection. I don't
21 know what a conspiracy has to do with whether she has an
22 allowed Claim. I don't know what information in a third
23 party's bank statement has to do -- a third party bank
24 statement that's several years after the Claim events accrued
25 has any relation to whether or not she has an allowed Claim

9 So, I am going to grant the Motion, issue a
0 Protective Order, and finding that there is no further
1 obligation for Citizens Bank to respond to the Subpoena, I'm
2 going to Quash the Subpoena.

21 And I'm going to require the Bernstein Firm to
22 disclose any and all Subpoenas that have been issued in this
23 Bankruptcy case related to this Claim Objection, and to
24 disclose that within the next seven days.

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1 Gaul. This is your first time in front of me on this case, so
2 you do not have the benefit of hearing it from me. I'm sure
3 you've heard it from your colleagues. But your firm needs to
4 definitely have a self-introspection on what it's doing in this
5 case because it's not moving the ball forward for Ms. Biros in
6 any semblance.

7 I am continuously engaged in exercises such as this
8 which are a complete waste of the Court's time, the parties'
9 time, it's a waste of your client's resources, it's driving up
10 the expense for an Estate that has no value to it. And you
11 know I've got to be candid, I think this is doing damage to
12 your firm's reputation.

13 I don't know if this is being internally generated by
14 your firm or if it's at the insistence of your client, but
15 think long and hard about what this is going to do to your firm
16 long-term in view of credibility and reasonableness because
17 this is certainly not a measured approach. This is scorched
18 earth. This is beyond the pale.

19 And as I said, I issued a Rule 11 Opinion before and
20 if that didn't dissuade folks from going down this path, then
21 you know I can't apologize for what might happen next.

22 MR. GAUL: Understood, Your Honor.

23 THE COURT: All right. Mr. Lacher raised the issue
24 about the meet and confer. Again I would encourage the parties
25 to continue to work together, but I'm not holding out any hope

1 that that's going to resolve in any true Settlement. I could
2 be proven wrong, but the parties are just too entrenched and
3 hate each other too much to do that.

4 And the other thing I would just advise the parties.
5 I think it's clear from how we're proceeding, but I want to
6 make sure Mr. Lacher is aware of this. I had mentioned this
7 before in a prior hearing. But I know there's been the Motion
8 to Withdraw the Reference as to the Claim Objection, and that's
9 being transmitted to the District Court, and the District Court
10 will hear that when it hears it.

11 But, in the meantime, I just want to make sure we're
12 clear. I still intend to proceed forward until the District
13 Court rules on that Motion. So, there's no misconceptions from
14 the parties on how we're going to proceed, is that understood?

15 MR. LACHER: One hundred percent, Your Honor, it's
16 understood. And as you know, I brought this up at the last
17 hearing, it's limited to this matter, and it's only because the
18 District Court held it in the first place, and I hope the Court
19 doesn't take it as any kind of sleight. It's absolutely --

20 THE COURT: I have pretty thick skin when it comes to
21 this stuff.

22 MR. LACHER: I believe that's where it should be.

23 THE COURT: So, I don't take it that way, and the
24 parties are entitled to exercise whatever rights they wish to
25 exercise. But where I do take personally is that the parties

Case 2:20-cv-00274 Document 43 Filed 06/23/23 Page 23 of 23

Case 2:20-cv-00274-CLT Document 43 Filed 06/23/23 Page 23 of 23

Case 2:20-cv-00274 Document 43 Filed 06/23/23 Page 23 of 23

Case 2:20-cv-00274 Document 43 Filed 06/23/23 Page 23 of 23

Case 2:20-cv-00274-CLT Document 43 Filed 06/23/23 Page 23 of 23

Case 2:20-cv-00274-CLT Document 43 Filed 06/23/23 Page 23 of 23

Case 2:20-cv-00274-CLT Document 43 Filed 06/23/23 Page 23 of 23

Case 2:20-cv-00274-CLT Document 43 Filed 06/23/23 Page 23 of 23

Case 2:20-cv-00274-CLT Document 43 Filed 06/23/23 Page 23 of 23

Case 2:20-cv-00274-CLT Document 43 Filed 06/23/23 Page 23 of 23

Case 2:20-cv-00274-CLT Document 43 Filed 06/23/23 Page 23 of 23

Case 2:20-cv-00274-CLT Document 43 Filed 06/23/23 Page 23 of 23